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**UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON**

**LORI WAKEFIELD**, individually and  
on behalf of a class of others similarly  
situated,

Plaintiff,

v.

**VISALUS, INC.**,  
a Nevada corporation,

Defendant.

No. 3:15-cv-01857-SI

**Plaintiff's unopposed motion for an  
extension of time to file a response to  
Defendant's motion for judgment as  
a matter of law and for a new trial**

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*Attorneys for Plaintiff Wakefield and the Certified Class*

**LR 7-1 CERTIFICATION**

Counsel for Plaintiff conferred with counsel for Defendant and Defendant consents to the relief requested.

**MOTION**

Plaintiff Lori Wakefield moves to extend the deadline to file a response to Defendant's motion for judgment as a matter of law and for a new trial to October 15, 2020. In support of the motion, Plaintiff states:

1. The current deadline for Plaintiff's response to Defendant's motion for judgment as a matter of law and for a new trial (Dkt. 395) is October 8, 2020.
2. On September 29, 2020, Plaintiff requested that Defendant agree to a one-week extension on the deadline to respond to the motion. Defendant agreed.
3. Good cause exists for the requested extension. Plaintiff requires the additional time to address the numerous issues raised in Defendant's motion, including because counsel for Plaintiff needs to devote significant time to other matters during the response period. This extension will not impact other existing deadlines. This extension is not sought for purposes of delay.

NOW, THEREFORE, Plaintiff respectfully requests that the Court enter an order extending the deadline for Plaintiff to file a response to Defendant's motion for judgment as a matter of law and for a new trial until October 15, 2020.

Date: September 29, 2020

Respectfully submitted,

By: /s/ Simon Franzini

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